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IN THE

United States District Court for the
Eastern District of North Carolina

PETER A. MOORE, JR., CLERK
US DISTRICT COURT, EDNC

Southern Division

ANDREW U. D. STRAW,
Plaintiff,

v.

UNITED STATES OF AMERICA,
Defendant.

) Case#: 7:23-cv-162-BO-BM
)
) Hon. Terrence Boyle
) Judge Presiding
) Hon. Brian Meyers
) Magistrate Judge
)
) JURY TRIAL DEMANDED

LETTER TO THE COURT ON CONTINUING CONTAMINATION
AFTER 1987 AT CAMP LEJEUNE

COMES NOW, *pro se Plaintiff* ANDREW U. D. STRAW (hereinafter "Plaintiff"),
individually, hereby make this **LETTER** to edify on the much wider contamination:

FACTS

1. The Camp LeJeune Justice Act of 2022, SEC. 804 of the PACT Act set a 1953-1987 window for allowing claims.
2. We know that this same group was denied in MDL-2218 using a variety of defenses, such as *Feres* doctrine and the N.C. Statute of Repose.
3. What exactly changed in 1987 by "capping the wells?" The water going through the pipes may have improved in quality to a usable level.
4. That simple change is being touted as a reason to set a time limit in CLJA.
5. But I believe Congress was deceived. The base was still toxic in 1988 whether the tap water was better or not. All the toxins were still on the base and EPA

quietly began engaging in a hundreds of cleanup actions that were not limited to drinking water wells. There was contamination all over the base, seeping into buildings as gases, for instance, and we have proof of it in the EPA's cleanup webpage. Exhibit Attached.

6. Congress may have been deceived into limiting the time span with the deceptive statement of "the drinking water wells that were contaminated were capped in 1987." *See* <https://clnr.hqi.usmc.mil/>
7. Some are saying that the 1953-1987 exposure victims covered by CLJA should have a database. I think that's a great idea. This will allow statistical analysis to be done to show whether certain diseases are more frequent in this group and thus compensable, as one measure of association, equipoise causation.
8. I see no reason for such a database to exclude allowing others present or stationed at Camp LeJeune from 1988 forwards also being allowed to enter their data. It does not cost any extra and it would allow Congress to revisit the 1987 deadline if health problems continued to be caused by Camp LeJeune, still being used long after 1987. It is being used today.
9. The military misdirects people by calling it "historic water." As if the people being made sick by the toxins still present at that base are somehow left to flounder like the earlier victims in a sea of unfair DOJ defenses.
10. Somebody exposed and injured in 1988 or 1989, the year the EPA turned the whole base into a **Superfund site**, will run into the same defenses used by the

DOJ and Navy in MDL-2218 that CLJA overturns for some. *Feres*. The Statute of Repose of North Carolina, various immunity arguments, and so on.

11. I suspect that Camp LeJeune, with all those remediations listed by the EPA over the past 35 years, caused more injuries.

12. Those victims when opposed will wait years, again, until Congress acts.

13. This is not about “historic drinking water.” It is about **a base contaminated, everywhere**, with hundreds of remediations all over the base.

14. Like with the 9/11 compensation, www.vcf.gov, the deadline here is likely to be expanded beyond August 10, 2024. In all fairness, it should be 2090, just like 9/11 toxic dust victims. Congress needs to take care of that.

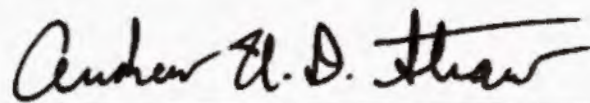
15. Congress also needs to be informed that the toxic exposure and injuries from Camp LeJeune extended well beyond 1987 because it was never just about the water. The toxic water is just an easy thing to point to when **this base is a Superfund site** where babies are being born, children are going to school, and the government is in a longstanding pattern of lying and delaying justice.

16. **CLJA should not have any end date.** The 1987 “well capping” is a false flag, generated by those who want to deny and delay as they have always done. If someone present there after 1987 can prove a condition associated with the hundreds of different toxins in the soil, water, and air, injury in 2023 is just as painful as being poisoned in 1968. Another task for Congress, expanding this Act so that it provides Camp LeJeune Justice fully and completely, not piecemeal.

WHEREFORE, I make this **LETTER** simply to inform the Court that this problem is much bigger than the government reveals and to simply suggest that the database of victims here and their conditions should allow those present after 1987 to also enter their data and evidence, even if CLJA compensation is not available to them, yet.

I, *pro se plaintiff* Andrew U. D. Straw, verify that the above factual contentions and statements are true and correct to the best of my knowledge, information, and belief, on penalty of perjury. Signed: **August 27, 2023**.

Respectfully,



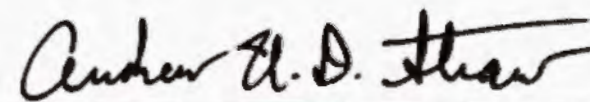
s/ ANDREW U. D. STRAW

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Washington, D.C. 20002
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andrew@andrewstraw.com

CERTIFICATE OF SERVICE

I, Andrew U. D. Straw, certify that on **August 27, 2023**, I sent this **NOTICE**. I sent this document via U.S. Mail to the Clerk of Court on **August 27, 2023**. CM/ECF will serve the defendants when the Clerk scans this document.

Respectfully submitted,



s/ ANDREW U. D. STRAW

Pro Se Plaintiff

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CAMP LEJEUNE MILITARY RES. (USNAVY) ONSLOW COUNTY, NC

Cleanup Progress

On this page:

- [Site Milestones](#)
- [Cleanup Schedule by Operable Unit](#)

Cleaning up Superfund sites is a complex, multi-phase process. Learn more:

- [Superfund Cleanup Process](#)
- [A community guide to EPA's Superfund program \(PDF\)](#) (12 pp, 454 KB)

Site Milestones

Milestone	Date(s)
Initial Assessment Completed	02/15/1988
Proposed to the National Priorities List	06/24/1988
Finalized on the National Priorities List	10/04/1989
Remedial Investigation Started	06/28/1990
Remedy Selected	09/23/1992
Final Remedy Selected	Estimated Oct - Dec 2024
Remedial Action Started	09/30/1993
Final Remedial Action Started	08/10/2020
Construction Completed	Not Yet Achieved
Deleted from National Priorities List	Not Yet Achieved
Most Recent Five-Year Review	08/31/2020
Achieved Sitewide Ready for Anticipated Reuse	Not Yet Achieved

Cleanup Schedule by Operable Unit

During cleanup, a site can be divided into a number of distinct areas depending on its complexity. These areas, called operable units (OUs), may address geographic areas, specific problems, or areas where a specific action is required. Examples of typical operable units include construction of a groundwater pump and treatment system or construction of a cap over a landfill.

Select an operable unit. After making a selection, press go to filter the table by operable unit.

Go

Search: <input type="text" value="Search All Columns"/>		
Milestone	Start Date	Completion Date
OU 00 - SITEWIDE		
Five-Year Review (<i>Federal Facility Performed, EPA Oversight</i>)		11/29/1999
Five-Year Review (<i>Federal Facility Performed, EPA Oversight</i>)		03/24/2005
Five-Year Review (<i>Federal Facility Performed, EPA Oversight</i>)		09/30/2010
Five-Year Review (<i>Federal Facility Performed, EPA Oversight</i>)		09/16/2015
Five-Year Review (<i>Federal Facility Performed, EPA Oversight</i>)		08/31/2020
Five-Year Review		Estimated Sep - Nov 2025
OU 01 - SHALLOW ACQUIFER (HPIA)		
Combined Remedial Investigation/Feasibility Study (<i>Federal Facility Performed, EPA Oversight</i>)	03/01/1991	09/23/1992
Record of Decision (<i>Federal Facility Performed, EPA Oversight</i>)		09/23/1992
Remedial Design (<i>Federal Facility Performed, EPA Oversight</i>)	09/30/1992	06/23/1993

Milestone	Start Date	Completion Date
Remedial Action (<i>Federal Facility Performed, EPA Oversight</i>)	09/30/1993	06/30/1995
OU 02 - SITE 21, 24, 78 (HIPA)		
Remedial Investigation	Estimated Mar - May 2024	Estimated Mar - May 2025
Combined Remedial Investigation/Feasibility Study (<i>Federal Facility Performed, EPA Oversight</i>)	03/01/1991	09/15/1994
Record of Decision (<i>Federal Facility Performed, EPA Oversight</i>)		09/15/1994
Remedial Design (<i>Federal Facility Performed, EPA Oversight</i>)	08/15/1994	11/11/1994
Remedial Action (<i>Federal Facility Performed, EPA Oversight</i>)	03/20/1995	02/13/1997
OU 03 - SITE 6, 9, & 82		
Removal (<i>Federal Facility Performed, EPA Oversight</i>)	11/22/1993	02/28/1995
Remedial Investigation	Estimated Mar - May 2024	Estimated Mar - May 2025
Combined Remedial Investigation/Feasibility Study (<i>Federal Facility Performed, EPA Oversight</i>)	06/28/1990	09/24/1993
Record of Decision (<i>Federal Facility Performed, EPA Oversight</i>)		09/24/1993
Explanation of Significant Differences (<i>Federal Facility Performed, EPA Oversight</i>)		04/04/2017
Remedial Design (<i>Federal Facility Performed, EPA Oversight</i>)	10/25/1993	09/30/1994
Remedial Action (<i>Federal Facility Performed, EPA Oversight</i>)	01/27/1995	10/09/1996

Milestone	Start Date	Completion Date
OU 04 - SITE 48		
Combined Remedial Investigation/Feasibility Study (Federal Facility Performed, EPA Oversight)	10/04/1990	09/10/1993
Record of Decision (Federal Facility Performed, EPA Oversight)		09/10/1993
OU 05 - SITE 74, 41		
Combined Remedial Investigation/Feasibility Study (Federal Facility Performed, EPA Oversight)	08/21/1991	12/05/1995
Record of Decision (Federal Facility Performed, EPA Oversight)		12/05/1995
Remedial Design (Federal Facility Performed, EPA Oversight)	03/25/1996	08/30/1996
Remedial Action (Federal Facility Performed, EPA Oversight)	08/30/1996	08/03/2006
OU 06 - SITE 2		
Removal (Federal Facility Performed, EPA Oversight)	06/01/1994	01/30/1995
Combined Remedial Investigation/Feasibility Study (Federal Facility Performed, EPA Oversight)	09/29/1992	09/15/1994
Record of Decision (Federal Facility Performed, EPA Oversight)		09/15/1994
Remedial Design (Federal Facility Performed, EPA Oversight)	12/28/1994	11/07/1995
Remedial Action (Federal Facility Performed, EPA Oversight)	02/29/1996	02/29/1996
Remedial Action (Federal Facility Performed, EPA Oversight)	02/29/1996*	11/10/2008

Milestone	Start Date	Completion Date
OU 07 - SITES 36,43,44,54		
Removal (<i>Federal Facility Performed, EPA Oversight</i>)	05/19/1995	07/15/1995
Removal (<i>Federal Facility Performed, EPA Oversight</i>)	09/04/1997	09/29/1997
Removal (<i>Federal Facility Performed, EPA Oversight</i>)	03/21/2001	04/14/2001
Remedial Investigation (<i>Federal Facility Performed, EPA Oversight</i>)	06/15/2023	Estimated Sep - Nov 2024
Remedial Investigation	Estimated Dec 2023 - Feb 2024	Estimated Dec 2024 - Feb 2025
Combined Remedial Investigation/Feasibility Study (<i>Federal Facility Performed, EPA Oversight</i>)	06/08/1994	07/06/2005
Record of Decision (<i>Federal Facility Performed, EPA Oversight</i>)		07/06/2005
Remedial Design (<i>Federal Facility Performed, EPA Oversight</i>)	08/09/2005	09/22/2005
Remedial Action (<i>Federal Facility Performed, EPA Oversight</i>)	08/01/2005	08/27/2007
OU 08 - SITES 1, 28,& 30		
Combined Remedial Investigation/Feasibility Study (<i>Federal Facility Performed, EPA Oversight</i>)	06/30/1993	10/09/1996
Record of Decision (<i>Federal Facility Performed, EPA Oversight</i>)		10/09/1996
Remedial Design (<i>Federal Facility Performed, EPA Oversight</i>)	04/15/1997	04/15/1997
Remedial Action (<i>Federal Facility Performed, EPA Oversight</i>)	07/31/1997	09/16/2002

Milestone	Start Date	Completion Date
OU 09 - SITE 16		
Combined Remedial Investigation/Feasibility Study (Federal Facility Performed, EPA Oversight)	12/02/1991	08/23/1996
Record of Decision (Federal Facility Performed, EPA Oversight)		08/23/1996
OU 10 - SITE 65		
Combined Remedial Investigation/Feasibility Study (Federal Facility Performed, EPA Oversight)	04/13/1992	09/28/2001
Record of Decision (Federal Facility Performed, EPA Oversight)		09/28/2001
OU 11 - SITE 35		
Combined Remedial Investigation/Feasibility Study (Federal Facility Performed, EPA Oversight)	06/30/1993	09/22/1995
Record of Decision (Federal Facility Performed, EPA Oversight)		09/15/1994
Record of Decision (Federal Facility Performed, EPA Oversight)		09/22/1995
Record of Decision (Federal Facility Performed, EPA Oversight)		11/16/2009
Remedial Design (Federal Facility Performed, EPA Oversight)	10/11/1994	12/22/1994
Remedial Design (Federal Facility Performed, EPA Oversight)	02/10/1997	08/18/1997
Remedial Design (Federal Facility Performed, EPA Oversight)	12/04/2009	05/28/2010
Remedial Action (Federal Facility Performed, EPA Oversight)	07/21/1995	12/05/1995

Milestone	Start Date	Completion Date
Remedial Action (<i>Federal Facility Performed, EPA Oversight</i>)	08/04/2010	07/21/2011
OU 12 - SITE 7 & 80		
Removal (<i>Federal Facility Performed, EPA Oversight</i>)	12/15/1995	09/30/1996
Combined Remedial Investigation/Feasibility Study (<i>Federal Facility Performed, EPA Oversight</i>)	04/04/1994	01/20/1998
Record of Decision (<i>Federal Facility Performed, EPA Oversight</i>)		01/20/1998
Record of Decision (<i>Federal Facility Performed, EPA Oversight</i>)		10/16/2012
OU 13 - SITE 3		
Combined Remedial Investigation/Feasibility Study (<i>Federal Facility Performed, EPA Oversight</i>)	04/04/1994	05/15/1997
Record of Decision (<i>Federal Facility Performed, EPA Oversight</i>)		05/15/1997
Record of Decision Amendment (<i>Federal Facility Performed, EPA Oversight</i>)		06/20/2000
Remedial Design (<i>Federal Facility Performed, EPA Oversight</i>)	08/27/1997	03/31/1998
Remedial Design (<i>Federal Facility Performed, EPA Oversight</i>)	04/09/1998	01/25/1999
Remedial Action (<i>Federal Facility Performed, EPA Oversight</i>)	06/18/2000	04/16/2001
Operation and Maintenance (<i>Federal Facility Performed, EPA Oversight</i>)	04/16/2001	Estimated Jun - Aug 2025
OU 14 - SITE 63		

Milestone	Start Date	Completion Date
Combined Remedial Investigation/Feasibility Study (Federal Facility Performed, EPA Oversight)	06/23/1995	05/15/1997
Record of Decision (Federal Facility Performed, EPA Oversight)		05/15/1997
OU 15 - SITE 69		
Combined Remedial Investigation/Feasibility Study (Federal Facility Performed, EPA Oversight)	08/21/1991	09/27/2000
Combined Remedial Investigation/Feasibility Study (Federal Facility Performed, EPA Oversight)	12/01/2011	06/25/2013
Record of Decision (Federal Facility Performed, EPA Oversight)		09/27/2000
Record of Decision (Federal Facility Performed, EPA Oversight)		06/25/2013
Remedial Action (Federal Facility Performed, EPA Oversight)	10/22/2000	09/30/2001
Remedial Action (Federal Facility Performed, EPA Oversight)	12/09/2013	09/17/2015
OU 16 - SITE 88		
Removal (Federal Facility Performed, EPA Oversight)	11/19/1995	09/30/1996
Removal (Federal Facility Performed, EPA Oversight)	03/22/1996	09/30/1996
Combined Remedial Investigation/Feasibility Study (Federal Facility Performed, EPA Oversight)	02/21/1997	05/23/2019
Record of Decision (Federal Facility Performed, EPA Oversight)		05/23/2019

Milestone	Start Date	Completion Date
Remedial Design (<i>Federal Facility Performed, EPA Oversight</i>)	02/11/2020	07/23/2020
Remedial Action (<i>Federal Facility Performed, EPA Oversight</i>)	08/10/2020	07/11/2023
OU 17 - SITE 89, 93		
Removal (<i>Federal Facility Performed, EPA Oversight</i>)	06/22/2000	09/28/2001
Combined Remedial Investigation/Feasibility Study (<i>Federal Facility Performed, EPA Oversight</i>)	04/07/1997	10/02/2006
Combined Remedial Investigation/Feasibility Study (<i>Federal Facility Performed, EPA Oversight</i>)	04/07/1997	12/16/2012
Record of Decision (<i>Federal Facility Performed, EPA Oversight</i>)		10/02/2006
Record of Decision (<i>Federal Facility Performed, EPA Oversight</i>)		12/16/2012
Remedial Design (<i>Federal Facility Performed, EPA Oversight</i>)	08/31/2006	11/30/2006
Remedial Design (<i>Federal Facility Performed, EPA Oversight</i>)	09/07/2006	10/02/2006
Remedial Design (<i>Federal Facility Performed, EPA Oversight</i>)	09/21/2012	11/07/2012
Remedial Action (<i>Federal Facility Performed, EPA Oversight</i>)	10/24/2006	09/10/2009
Remedial Action (<i>Federal Facility Performed, EPA Oversight</i>)	03/03/2013	10/10/2014
OU 18 - SITE 90, 91, 92		
Combined Remedial Investigation/Feasibility Study (<i>Federal Facility Performed, EPA Oversight</i>)	02/21/1997	09/28/2001

Milestone	Start Date	Completion Date
Record of Decision (<i>Federal Facility Performed, EPA Oversight</i>)		09/28/2001
OU 19 - SITE 94		
Combined Remedial Investigation/Feasibility Study (<i>Federal Facility Performed, EPA Oversight</i>)	12/16/1998	08/28/2006
Record of Decision (<i>Federal Facility Performed, EPA Oversight</i>)		08/28/2006
OU 20 - SITE 84		
Combined Remedial Investigation/Feasibility Study (<i>Federal Facility Performed, EPA Oversight</i>)	05/02/2000	01/21/2009
Record of Decision (<i>Federal Facility Performed, EPA Oversight</i>)		01/21/2009
Remedial Design (<i>Federal Facility Performed, EPA Oversight</i>)	05/06/2009	07/20/2009
Remedial Action (<i>Federal Facility Performed, EPA Oversight</i>)	10/02/2009	06/10/2010
OU 21 - SITE 86		
Remedial Investigation	Estimated Sep - Nov 2023	Estimated Sep - Nov 2024
Combined Remedial Investigation/Feasibility Study (<i>Federal Facility Performed, EPA Oversight</i>)	07/26/2001	10/29/2014
Record of Decision (<i>Federal Facility Performed, EPA Oversight</i>)		10/29/2014
Remedial Action (<i>Federal Facility Performed, EPA Oversight</i>)	05/11/2015	10/28/2015
OU 22 - SITE 73		

Milestone	Start Date	Completion Date
Combined Remedial Investigation/Feasibility Study (Federal Facility Performed, EPA Oversight)	03/20/2001	12/01/2009
Record of Decision (Federal Facility Performed, EPA Oversight)		12/01/2009
Remedial Design (Federal Facility Performed, EPA Oversight)	01/19/2010	09/03/2010
Remedial Action (Federal Facility Performed, EPA Oversight)	04/05/2011	09/01/2011
OU 23 - UXO-22		
Remedial Investigation (Federal Facility Performed, EPA Oversight)	10/31/2010	05/19/2017
OU 24 - SITE 49		
Remedial Investigation (Federal Facility Performed, EPA Oversight)	03/14/2011	04/24/2014
Record of Decision (Federal Facility Performed, EPA Oversight)		04/24/2014
Remedial Design (Federal Facility Performed, EPA Oversight)	10/29/2013	01/31/2014
Remedial Action (Federal Facility Performed, EPA Oversight)	03/19/2014	01/15/2015
OU 25 - SITE UXO-06		
Combined Remedial Investigation/Feasibility Study (Federal Facility Performed, EPA Oversight)	04/23/2012	04/30/2018
Record of Decision (Federal Facility Performed, EPA Oversight)		04/30/2018
Remedial Design (Federal Facility Performed, EPA Oversight)	06/01/2018	08/30/2018
Remedial Action (Federal Facility Performed, EPA Oversight)	02/21/2019	09/24/2019

Milestone	Start Date	Completion Date
OU 27 - UXO-19		
Combined Remedial Investigation/Feasibility Study (Federal Facility Performed, EPA Oversight)	06/04/2012	12/09/2015
Record of Decision (Federal Facility Performed, EPA Oversight)		12/09/2015
OU 28 - UXO-23		
Combined Remedial Investigation/Feasibility Study (Federal Facility Performed, EPA Oversight)	10/15/2012	03/23/2018*
OU 29 - UXO-24 SITE 37 (OU26)		
Combined Remedial Investigation/Feasibility Study (Federal Facility Performed, EPA Oversight)	10/15/2018	09/30/2019
Record of Decision (Federal Facility Performed, EPA Oversight)		09/30/2019
Remedial Design (Federal Facility Performed, EPA Oversight)	07/29/2019	10/04/2019
Remedial Action (Federal Facility Performed, EPA Oversight)	10/04/2019	11/14/2019
OU 30 - UXO-28 (OU30)		
Combined Remedial Investigation/Feasibility Study (Federal Facility Performed, EPA Oversight)	05/08/2019	Estimated Mar - May 2025
Record of Decision		Estimated Mar - May 2025
OU 31 - UXO-29 (OU31)		

Milestone	Start Date	Completion Date
Combined Remedial Investigation/Feasibility Study (Federal Facility Performed, EPA Oversight)	05/20/2019	Estimated Oct - Dec 2024
Record of Decision		Estimated Oct - Dec 2024
OU 32 - SITE 96 (OU22)		
Combined Remedial Investigation/Feasibility Study (Federal Facility Performed, EPA Oversight)	06/02/2015	09/28/2022
Record of Decision (Federal Facility Performed, EPA Oversight)		09/28/2022
Remedial Design (Federal Facility Performed, EPA Oversight)	03/02/2023	07/06/2023
OU 33 - SITE UXO-30 (OU33)		
Combined Remedial Investigation/Feasibility Study (Federal Facility Performed, EPA Oversight)	08/18/2022	Estimated Feb - Apr 2024
Record of Decision		Estimated Feb - Apr 2024
OU 34 - SITE 111 (OU34)		
Combined Remedial Investigation/Feasibility Study (Federal Facility Performed, EPA Oversight)	05/06/2022	Estimated May - Jul 2025
Record of Decision		Estimated May - Jul 2025
OU 35 - SITE 112 (OU35)		
Remedial Investigation	Estimated Jun - Aug 2023	Estimated Jun - Aug 2024
OU 36 - SITE 113 (OU36)		

Milestone	Start Date	Completion Date
Remedial Investigation	Estimated Dec 2023 - Feb 2024	Estimated Dec 2024 - Feb 2025
OU 37 - SITE 114 (OU37)		
Remedial Investigation (<i>Federal Facility Performed, EPA Oversight</i>)	07/26/2023	Estimated Jun - Aug 2024
OU 38 - SITE 115 (OU38)		
Remedial Investigation	Estimated Dec 2023 - Feb 2024	Estimated Dec 2024 - Feb 2025
OU 39 - SITE 117 (OU39)		
Remedial Investigation	Estimated Mar - May 2024	Estimated Mar - May 2025

Showing 1 to 143 of 143 entries

*NOTE: This date may not reflect the actual start or actual completion of the milestone. Either the lead for this activity changed, the project was phased, or the project did not fit the normal definitions of activities tracked in this table.

NOTE: Dates and estimated dates will not display for all milestones. Estimated dates only display for milestones planned within the next three fiscal years. Estimated dates and start dates will not display for the following enforcement milestones: Administrative Order of Consent, Consent Decree and Unilateral Administrative Order. Start dates will not display for the following document milestones: Five-Year Review, Record of Decision, Record of Decision Amendment, Explanation of Significant Differences and Partial NPL Deletion.

DISCLAIMER: The data on this page are derived from the Superfund Enterprise Management System and are solely for informational purposes. The data cannot be relied upon to create any substantive or procedural rights or requirements enforceable by any party in litigation with any member of the public, states, tribes, the United States or any federal agency. EPA reserves the right to change these data at any time without public notice.

AUGUST 27, 2023